REMARKS

Claims 1-23 are pending in the present application. Claims 1, 8, 11, 12 and 13 have been amended and claims 17-24 have been added herein. No new matter has been added. Applicants respectfully request reconsideration of the claims in view of the following remarks.

A replacement drawing sheet is provided herewith correcting an error in originally filed Figure 3. In particular, block 60 shows a "block address argument" rather than a "byte address argument" as explained in paragraph 29.

Applicant notes with appreciation the indication of allowance of claims 11 and 12. As a result, each of these claims has been amended herein to be placed in independent form.

Claims 1-8 and 13-16 have been rejected under 35 U.S.C. § 102(a) as being anticipated by Lakhani and claims 9-10 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Lakhani in view of Zer. Applicant respectfully traverses these rejections.

Claim 1, as amended, specifically recites that "the remaining bits provide a byte address when the address argument is a byte address argument and the remaining bits provide a block address when the address argument is a block address argument." Applicant respectfully submits that the references of record do not teach or suggest the limitations of claim 1.

In Lakhani, contrary to the claimed invention, the address argument bits are always either block address bits or byte address bits. In particular, address bits A22:A19 determine the main block and address bits A18:A16 determine the erase block. Lakhani, Par. [0038]. Further, address bits A4:A0 determine the byte. *Id.* This addressing scheme remains in all modes. *See* Lankhani, Par. [0069]-[0070]. There are no two modes where particular bits (i.e., the "remaining bits" in claim 1) provide a byte address in one mode and a block address in the other mode.

In the claimed invention, on the other hand, the remaining bits provide a byte address when the address argument is a byte address argument and the remaining bits provide a block address when the address argument is a block address argument. This scheme is simply not taught or suggested by the prior art. As a result, it is respectfully submitted that claim 1 is allowable over the references of record.

Claims 2-7 depend from claim 1 and add further limitations. It is respectfully submitted that these dependent claims are allowable by reason of depending from an allowable claim as well as for adding new limitations.

Claim 8, as amended, specifically recites that "in the byte addressing mode, address bits of an address argument of the command provide a byte address, and in the block addressing mode, said address bits of the address argument of the command provide a block address." As discussed above with respect to claim 1, the prior art of record never teaches or suggests address bits that provide a byte address in a first mode and a block address in a second mode. Therefore, it is respectfully submitted that claim 8 is allowable over the references of record.

In view of the Examiner's position, claim 8 has been amended so that the block addressing mode need not be made up of unused bit(s) of the address argument. Rather, claim 17 has been added.

Claims 9-10 and 17 depend from claim 8 and add further limitations. It is respectfully submitted that these dependent claims are allowable by reason of depending from an allowable claim as well as for adding new limitations.

Claim 13, as amended, specifically recites "when said address argument is a byte address argument, address bits of the address argument provide a byte address, and when said address argument is a block address argument, said address bits of the address argument provide a block

address." As discussed above with respect to claim 1, the prior art of record never teaches or suggests address bits that provide a byte address in a first mode and a block address in a second mode. Therefore, it is respectfully submitted that claim 13 is allowable over the references of record.

As a housekeeping matter, Applicant notes that the preamble of claim 13 was improperly amended in the previous response. (The new language was not underlined.) To avoid any confusion, Applicant provides the corrected amendment protocol here.

Claims 14-16 depend from claim 13 and add further limitations. It is respectfully submitted that these dependent claims are allowable by reason of depending from an allowable claim as well as for adding new limitations.

Claims 17-24 have been added herein. No new matter has been added. It is respectfully submitted that these claims are allowable over the references of record.

Applicant has made a diligent effort to place the claims in condition for allowance. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone Ira S. Matsil, Applicant's attorney, at 972-732-1001, so that such issues may be resolved as expeditiously as possible. If the enclosed fees are deemed to be insufficient, the Commissioner is hereby authorized to charge, or credit any overpayment to, Deposit Account No. 50-1065.

Respectfully submitted,

/Ira S. Matsil/

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